

1 BRUCE SCOTT DICKINSON, ESQ.
Nevada Bar No. 002297
2 MICHAEL HOTTMAN, ESQ.
Nevada Bar No. 008501
3 JACQUELYN M. FRANCO, ESQ.
Nevada Bar No. 13484
4 STEPHENSON & DICKINSON, P.C.
5 2820 West Charleston Boulevard, Suite B-19
Las Vegas, Nevada 89102
6 Telephone: (702) 474-7229
7 Facsimile: (702) 474-7237
email: *admin@sdlawoffice.net*

8
9 Attorneys for Defendants

10 **IN THE UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12
13 HENRY LUJAN, an individual,

14 Plaintiff,

15 vs.

16 GORDON WESLEY THOMAS, an individual;
SWIFT TRANSPORTATION COMPANY, an
17 Arizona corporation; SWIFT
TRANSPORATION CO. OF ARIZONA, LLC,
18 a foreign corporation; DOES 1 through 10,
19 inclusive; and ROE CORPORATIONS I through
10, inclusive,

20 Defendants.
21

CASE NO.: 2:16-CV-02694-RFB-NJK

**STIPULATION AND ORDER TO EXTEND
DISCOVERY**

(THIRD REQUEST)

22 IT IS HEREBY STIPULATED AND AGREED, by Defendants and Plaintiff, by and through
23 their undersigned counsel, that discovery be extended 109 days beyond the Discovery Schedule in
24 the Discovery Plan dated June 6, 2017 (Document No. 19).

25 Per Federal Rules of Civil Procedure 16(b), and Local Rule 26-4 the following is included in
26 support of the proposed 90 day extension to the Discovery Schedule:

- 27 1. Local Rule 26-4(a) Statement: See Exhibit A.
28 2. Local Rule 26-4(b) Statement: See Exhibit B.


- 1 3. Local Rule 26-4(c) Statement: The parties are requesting this extension in order to
2 mediate. The mediation is scheduled for January 17, 2018 with David Wall, Esq. The
3 extension will allow the parties to position the case for settlement; and avoid the cost
4 of retaining rebuttal experts prior to the mediation.
- 5 a) Discovery Cut-Off Dates. The last day to conduct Discovery shall be Friday, March
6 9, 2018;
- 7 a) Amend Pleadings/Add Parties. Closed.
- 8 b) Initial Experts disclosure deadline. Closed
- 9 c) Rebuttal Expert Disclosure Deadline. Wednesday, February 7, 2018
- 10 d) Interim Status Report. Closed. Filed with the Court on September 25, 2017.
- 11 e) Dispositive Motions. The deadline to file dispositive motions will be on or before
12 Friday, April 6, 2018. This date does not exceed the outside limit of 30 days following
13 the Discovery cut-off date pursuant to Local Rule 26-1(e)(4).
- 14 f) Pre-trial Order. The pre-trial order shall be filed by Friday, May 4, 2018, which is not
15 more than 30 days after the date set for filing dispositive motions. This deadline is
16 suspended if dispositive motions are timely filed until 30 days after decision is rendered
17 or until the Court further orders.

18 The parties acknowledge that this request is outside the 21 day presumptive limit for
19 extending discovery deadlines. However, because the mediation date could only recently be
20 finalized, the parties respectfully submit this constitutes excusable neglect.

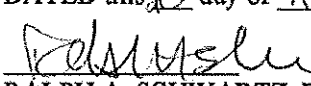
21 ///
22 ///
23 ///
24 ///
25 ///
26 ///
27 ///
28 ///

1 g) Extensions or Modifications of the Discovery Plan and Scheduling Order. Any
2 stipulation or motion must be made no later than 21 days prior to the deadline to be
3 extended; and must be supported by a showing of good cause for the extension.

4 DATED this 17 day of November, 2017.

5 
6 BRUCE SCOTT DICKINSON
7 Nevada Bar No. 002297
8 MICHAEL E. HOTTMAN, ESQ.
9 Nevada Bar No.: 008501
10 JACQUELYN M. FRANCO, ESQ.
11 Nevada Bar No. 13484
12 STEPHENSON & DICKINSON
13 2820 W. Charleston Blvd., Suite 19
14 Las Vegas, Nevada 89102
15 P: 702-474-7229
16 F: 702-474-7237
17 *Attorney for Defendants*

DATED this 22 day of November, 2017.


RALPH A. SCHWARTZ, ESQ.
Nevada Bar No.: 005488
RALPH A. SCHWARTZ, P.C.
400 South Seventh Street, Suite 100
Las Vegas, NV 89101
T: 702-888-5291
F: 702-888-5292
mail@888law1.com
Attorneys for Plaintiff44

14 **ORDER**

15 IT IS SO ORDERED.

16 Dated: November 21, 2017

17 
18 _____
19 U.S. MAGISTRATE JUDGE
20
21
22
23
24
25
26
27
28